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8 Attorneys for Defendant

9 IN THE UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 JOHN BRUCE,

12 Plaintiff,

13 vs.

14 KILOLO KIJAKAZI,
15 Acting Commissioner of Social Security,

16 Defendant.
17

No. 3:23-CV-00145-CSD

UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE
DEFENDANT'S OPENING BRIEF
(FIRST REQUEST)

18 Defendant respectfully requests that the Court extend the time for Defendant to respond
19 to Plaintiff's Motion for Reversal and/or Remand (Dkt. No. 8, filed on July 3, 2023), currently
20 due on August 4, 2023, by 60 days, through and including October 3, 2023. Defendant further
21 requests that all subsequent deadlines set forth in the Court's scheduling order be extended
22 accordingly. This is Defendant's first request for an extension to file Defendant's responsive
23 brief in this case.
24

25 Defendant submits that good cause exists for this extension request because the attorney
26 tasked with writing Defendant's response was recently reassigned to this matter and has seven
27 (7) cases with briefs currently due before August 16, and needs sufficient time to appropriately
28

1 review the case file and respond to Plaintiff's arguments. The assigned attorney has contacted
2 Plaintiff's counsel, who has no objection to this request.

3 For these reasons, this Court should grant Defendant's unopposed request and extend the
4 deadline to file a response to Plaintiff's opening brief. This request is made in good faith and
5 with no intention to unduly delay the proceedings.
6

7 It is therefore respectfully requested that Defendant be granted an extension of time to
8 file the response to Plaintiff's motion to remand, through and including October 3, 2023.
9

10 Respectfully submitted,


11 Date: July 26, 2023

12 JASON M. FRIERSON
13 United States Attorney
14 District of Arizona

15 By: /s/ Michonne L. Omo
16 MICHONNE L. OMO
17 Special Assistant United States Attorney
18 Attorneys for Defendant

19 Of Counsel:
20 GABRIEL BONO
21 Office of Program Litigation, Office 7
22 Social Security Administration
23 Office of the General Counsel
24

25 IT IS SO ORDERED

26 
27 UNITED STATES MAGISTRATE JUDGE
28 DATED: July 27, 2023